

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ANGEL PULLUM,

Plaintiff,

vs.

**SOUTHEAST ALABAMA
COMMUNITY ACTION
PARTNERSHIP, INC.**

Defendant.

)
)
)
)
)
)
)
)
)
)

CIVIL ACTION NO.

1:18-cv-00750-WC

JOINT MOTION FOR PROTECTIVE ORDER

The parties, by and through their undersigned counsel, hereby request that this Court enter the attached Protective Order and, as grounds, state as follows:

1. Documents, information and other materials, which may be responsive, or which may be requested, or which may be otherwise due to be disclosed or produced, may contain confidential, sensitive and/or proprietary information, as well as information regarding current and/or former employees of a Defendant.

2. Desiring to maintain the confidentiality of such information, while at the same time seeking to facilitate discovery, the parties therefore consent to the attached Protective Order.

WHEREFORE, the parties respectfully request that the attached Order be entered.

Respectfully submitted this 15th day of February, 2019.

s/Elizabeth B. Glasgow

Elizabeth B. Glasgow
Ashton Ott
Farmer, Price, Hornsby &
Weatherford, L.L.P.
100 Adris Place (36303)
Post Office Drawer 2228
Dothan, Alabama 36302
Attorneys for Plaintiff

s/Patrick D. Schach

Stacey T. Bradford
Patrick D. Schach
LITTLER MENDELSON, P.C.
420 20th Street North, Suite 2300
Birmingham, AL 35203
Telephone: 205.421.4700
Facsimile: 205.449.8446
Email: sbradford@littler.com
Email: pschach@littler.com
Attorneys for Defendant